

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

MAXELL, LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 5:19-cv-00036-RWS

JURY TRIAL DEMANDED

**PLAINTIFF MAXELL, LTD.'S FINAL
IDENTIFICATION OF TRIAL WITNESSES**

Plaintiff Maxell, Ltd. (“Maxell”), pursuant to the Court’s Order (D.I. 665), hereby identifies the following narrowed list of witnesses and rebuttal witnesses whom it will or may call at trial to testify in person, via remote means, by deposition designation, or by declaration. A witness identified as “In-Person” is expected to testify live in-person at the courthouse, a witness identified as “Remote” is expected to testify live by remote means, and a witness identified as “Designation” is expected to be presented by deposition designation.

	WITNESS, employer, topic of testimony	WILL CALL	MAY CALL	MAY, BUT PROBABLY WILL NOT CALL	IN-PERSON (I) REMOTE (R) DESIGNATION (D)
1.	Dr. Vijay Madiseti Infringement and Validity of U.S. Patent No. 8,339,493	X			I
2.	Dr. Craig Rosenberg Infringement and Validity of U.S. Patent Nos. 6,748,317, 6,430,498, and 6,580,999	X			I
3.	Dr. Tim Williams Infringement and Validity of U.S. Patent No. 7,116,438	X			R

4.	Robert L. Stoll USPTO Patent Practice and Procedures as it relates to determining the status of prior art under 35 U.S.C. § 102	X			R
5.	Dr. Tulin Erdem, Stern School of Business Survey Related to Smartphone Features Associated with U.S. Patent Nos. 6,748,317 and 6,580,999		X		R
6.	Carla Mulhern, Analysis Group Economic Analysis and Damages Resulting from Infringement of Asserted Patents	X			I
7.	Kenji Nakamura, Maxell Ltd. Maxell, Patent Ownership, Patent Licensing	X			I
8.	Norio Kitagata, Maxell Ltd. Maxell, Patent Ownership			X	
9.	Steven Washio, Maxell Corporation of America, Inc. Patent Licensing, Prior Dealings between Maxell and Apple	X			I
10.	Jun Maeoka, Inventor			X	
11.	Takahiro Nakano, Inventor			X	
12.	Alan Loudermilk Patent Licensing, Prior Dealings between Maxell and Apple	X			I
13.	Alex Ledwith, Apple Inc. Accused Watch Features and Functionalities		X		To discuss with Apple after receiving Apple's updated witness list
14.	Andrew McMahon, Apple Inc. Accused Camera Features and Functionalities		X		To discuss with Apple after receiving Apple's updated witness list

15.	Daniel Borges, Apple Inc. Accused AirDrop and Authentication Features and Functionalities		X		To discuss with Apple after receiving Apple's updated witness list
16.	Frank Casanova, Apple Inc. Apple Inc.; Accused Product Marketing and Advertising		X		To discuss with Apple after receiving Apple's updated witness list
17.	Heather Mewes, Apple Inc. Pre-suit Communications Between Apple and Maxell; Apple Patent Licensing and Acquisition		X		To discuss with Apple after receiving Apple's updated witness list
18.	Michael Jaynes, Apple Inc. Accused Product Sales and Financial Information		X		To discuss with Apple after receiving Apple's updated witness list
19.	Marc Krochmal, Apple Inc. Accused AirDrop and Authentication Features and Functionalities		X		To discuss with Apple after receiving Apple's updated witness list
20.	Patrick Coleman, Apple Inc. Accused Maps Features and Functionalities		X		To discuss with Apple after receiving Apple's updated witness list
21.	Paul Hubel, Apple Inc. Accused Camera Features and Functionalities		X		To discuss with Apple after receiving Apple's updated witness list
22.	Robert Mayor, Apple Inc. Accused Find My Friends and Maps Features and Functionalities		X		To discuss with Apple after receiving Apple's updated witness list
23.	Scott Lopatin, Apple Inc. Accused Find My Friends and Maps Features and Functionalities		X		To discuss with Apple after receiving Apple's updated witness list

24.	Dr. Alan Bovik Infringement and Validity of U.S. Patent No. 8,339,493			X	
25.	Dr. Daniel Menascé Infringement and Validity of U.S. Patent Nos. 6,329,794 and 7,116,438			X	
26.	Dr. Joseph Paradiso Infringement and Validity of U.S. Patent Nos. 6,748,317, 6,580,999, and 6,430,498			X	
27.	Dr. Andrew Mayo Apple Source Code			X	
28.	Jacob Robert Munford Publication and Public Accessibility of Prior Art			X	
29.	Lance Gunderson Economic Analysis and Damages Resulting from Infringement of Asserted Patents			X	
30.	Dr. Itamar Simonson Survey Related to Smartphone Features Associated with U.S. Patent Nos. 6,748,317 and 6,580,999; Purchase impact and value of iPhone, iPad, and Apple Watch Features			X	
31.	Qualcomm Representative, Accused Qualcomm Components			X	
32.	Garmin Representative			X	
33.	Kent Broddle, Former Garmin Engineer			X	D
34.	Louis Hruska			X	
35.	Skyworks Solutions Representative, Accused Skyworks Components			X	

36.	Intel Corporation Representative, Accused Intel Components			X	
37.	Broadcom Inc. Representative, Accused Broadcom Components			X	
38.	Avago Representative, Accused Avago Components			X	
39.	Qorvo, Inc. Representative, Accused Qorvo Components			X	
40.	TriQuint Representative, Accused TriQuint Components			X	
41.	Bosch Representative, Accused Bosch Components			X	
42.	ST Microelectronics, Inc. Representative, Accused ST Microelectronics Components			X	
43.	Murata Manufacturing Representative, Accused Murata Components			X	
44.	Universal Scientific Industrial Representative, Accused Universal Scientific Industrial Components			X	
45.	Samsung Display/Samsung Austin Semiconductor Representative, Accused Samsung Components			X	
46.	Sony Corporation of America Representative, Accused Sony Components			X	
47.	InvenSense Representative, Accused InvenSense Components			X	
48.	NXP Semiconductors Representative, Accused NXP Semiconductors Components			X	
49.	Toshiba Memory Representative, Accused Toshiba Components			X	
50.	Flex Ltd. Representative, Accused Flex Ltd. Components			X	

51.	Cirrus Logic, Inc. Representative, Accused Cirrus Logic Components			X	
52.	Texas Instruments Inc. Representative, Accused Texas Instruments Components			X	
53.	Dr. Andrew Lippman			X	
54.	Dr. Thomas La Porta			X	
55.	Dr. Victor Shoup			X	
56.	Dr. William Redman-White			X	
57.	Dr. Michael Kotzin			X	
58.	Dr. Jeffrey J. Rodriguez			X	
	Any and all witnesses identified in Apple Inc.'s disclosure of witnesses it will or may call at trial, either for its case-in-chief or rebuttal case.				

Maxell reserves the right to revise or supplement this list consistent with the Docket Control Order or as otherwise permitted by the Court. Maxell reserves the right to call or use any witnesses, designations, or declarations identified by Apple. Maxell also reserves the right to present witnesses by designation for any witness who, for any reason, is no longer able to testify “In-Person” or “Remote.” Finally, Maxell reserves the right to use in rebuttal any of the above listed affirmative witnesses, deposition designations, or declarations.

Dated: March 19, 2021

By: /s/ Jamie B. Beaber

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Counsel for Plaintiff Maxell, Ltd.

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 19th day of March, 2021 with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

Dated: March 19, 2021

/s/ Jamie B. Beaber

Jamie B. Beaber